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A Limited Liability Partnership
Including Professional Corporations
Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
Telephone: (415) 434-9100
Facsimile: (415) 434-3947
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jekim@sheppardmullin.com

Attorneys for The Roman Catholic Archbishop of San Francisco

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re _____ | Case No. 23-30564

THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO,

Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

Date: April 10, 2025

Time: 1:30 p.m.

Location: Via ZoomGov

Judge: Hon. Dennis Montali

**DECLARATION OF DAVID BRILL IN SUPPORT OF THIRD INTERIM
APPLICATION OF TRANSPERFECT LEGAL SOLUTIONS FOR ALLOWANCE OF
FEES AS PROVIDER OF LITIGATION SUPPORT CONSULTING
AND E-DISCOVERY SERVICES TO THE DEBTOR**

1 I, David Brill, declare as follows:

2 1. I am a Director, Strategic Accounts at TransPerfect Document Management, Inc.
3 and Chancery Staffing Solutions, LLC (d/b/a TransPerfect Staffing Solutions), together known as
4 TransPerfect Legal Solutions (“TransPerfect”). TransPerfect is the provider of litigation consulting
5 and e-discovery support solutions to The Roman Catholic Archbishop of San Francisco (“RCASF”
6 or the “Debtor”).

7 2. The matters stated herein are true and correct and are within my personal knowledge
8 or information provided to me by other attorneys or employees of TransPerfect, and if called upon
9 to testify as a witness, I could and would testify competently thereto.

10 3. This declaration is made in support of the *Third Interim Application of TransPerfect
11 Legal Solutions for Allowance of Fees as Provider of Litigation Support Consulting and E-
12 Discovery Services to the Debtor* (the “Application”). I give capitalized terms not defined here the
13 same meaning given to them in the Application.

14 4. By the Application, TransPerfect seeks an order of the Court: (a) awarding and
15 allowing interim compensation on account of litigation support consulting and e-discovery support
16 services rendered to the Debtor during the Application Period in the amount of \$2,065.00 and
17 reimbursement of expenses in the amount of \$9,251.38 for a total of \$11,316.38 incurred from
18 October 1, 2024 through and including January 31, 2025; (b) approving and ratifying amounts paid
19 by the Debtor to TransPerfect on account of such services rendered during the Application Period
20 in the aggregate amount of to \$6,917.02, or 80% of fees and 100% of expenses earned and incurred
21 during the Application Period as set forth in the Interim Monthly Fee Statements filed with the
22 Court during the Application Period; and (c) authorizing the Debtor to pay to TransPerfect the
23 balance due on account of fees awarded and allowed by the Court.

24 5. During the Application Period, TransPerfect professionals provided 11.80 hours of
25 litigation support consulting services (including related e-discovery support services) to the Debtor,
26 at the hourly rate of \$175.00. In this regard, TransPerfect has worked closely with the Debtor and
27 attorneys from Sheppard Mullin, Richter & Hampton LLP (“Sheppard Mullin”), co-counsel to the
28 Debtor, to respond fully and appropriately to the Committee’s discovery requests.

1 6. Specifically, TransPerfect has worked with the Debtor and Sheppard Mullin to
2 ensure appropriate and fulsome collection, and as appropriate hosting, of data; aided Sheppard
3 Mullin attorneys with their respective review and analysis of the data collected; and provided e-
4 discovery support related to production and export of appropriate and relevant documents to the
5 Committee, as set forth in the TransPerfect Service Employment Application. The Debtor has
6 required these services to ensure the efficient administration of this Bankruptcy Case, including,
7 but not limited to prompt responses to discovery requested by the Committee and other parties in
8 interest, all in furtherance of a prompt and consensual resolution of the Bankruptcy Case, if
9 possible.

10 7. In view of the time expended, the responsibilities assumed, and the reputation and
11 skill of the Applicant's professionals, I submit that the fees requested in the Application represent
12 the reasonable value of the services rendered on behalf of the Debtor. I believe that the services
13 rendered were necessary, and that the attorney's fees requested constitute reasonable and necessary
14 fees.

15 8. The Application is the Applicant's third interim application for compensation in the
16 Bankruptcy Case. TransPerfect has received payment from the Debtor for the fees and costs
17 allowed by the Court's prior interim orders.

18 9. Upon a review of the Application, I find that it accurately reflects the work
19 performed by the Applicant during the Application Period.

20 10. Pursuant to the *Order Establishing Procedures and Authorizing Payment of*
21 *Professional Fees and Expenses on a Monthly Basis* [ECF No. 212], TransPerfect has filed and
22 served fee notices for October 2024 [ECF No. 920], November 2024 [ECF No. 954], December
23 2024 [ECF No. 969] and January 2025 [ECF No. 1007]. No objections were received with respect
24 to the October, November, and December notices, while the time for objections to the January fee
25 notice has not yet expired. TransPerfect has received payments in the amount of \$6,917.02 from
26 the Debtor, such that it has been paid 80% of fees and 100% of expenses with respect to the October,
27 November and December fee notices. TransPerfect has not yet received a payment for January

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2025. The unpaid 20% holdback together with the January 2025 fees and costs total \$4,399.36. The retainer balance as of January 31, 2025, was \$0.00.

11. There is no agreement or understanding between the Applicant and any other person, other than members of the Applicant, for the sharing of compensation to be received for services rendered in the Bankruptcy Case.

12. Attached to this declaration as ***Exhibit A*** are copies of TransPerfect's invoices, which include detailed, contemporaneously maintained time entries by each professional in increments of tenths (1/10) of an hour to describe the fees incurred during the Application Period as well as descriptions of other fees incurred by the Debtor in accordance with the summary of key rates for Services (as defined in the TransPerfect Employment Application). The invoices have been filed with the Court in support of the Interim Monthly Fee Statement.

13. In an effort to comply with the Guidelines, TransPerfect maintains its time records for project management services in increments of tenths of an hour, contemporaneously maintained by the professional. As all of the services provided by TransPerfect professionals are related to the Project Billing Category of "Discovery" and related services, TransPerfect did not separately categorize its time records for services rendered to the Debtor.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 5, 2025, at Dallas, Texas.

David Brill
David Brill

1 **Exhibit A**
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3 October 1, 2024 through January 31, 2025
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5 Billing Statements
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CASE NO. 23-30564

Case: 23-30564 Doc# 1069 Filed: 03/06/25 Entered: 03/06/25 15:14:19 Page 5 of 17 DEC ISO TRANS PERFECT'S THIRD INTERIM FEE APPLICATION



Please note that our address has changed

Bill To:

Archdiocese Of San Francisco
Attn: Paula Carney
1 Peter Yorke Way
San Francisco, CA 94109
USA

Requested By:

Steven Gersten
Sheppard Mullin Richter & Hampton LLP
2200 Ross Ave
20th floor
Dallas, TX 75201
USA

Invoice #: 268946

Sales Contact: Zoe Saumell [REDACTED]

Invoice Date: 10/31/2024

Payment Terms: Net 30

Invoice Due: 11/30/2024

Contract #: DM0301925

Purchase Order #: RCASF Hosting October 2024

Requested Date: 10/01/2024

Project Notes:

RCASF Hosting October 2024

Description	Quantity	Unit	Unit Cost(\$)	Extended Cost(\$)
2024 October				
Monthly Storage Fees	160.00	GB	6.000	960.00
Project Management	0.80	Hour	175.000	140.00
Monthly User Access Fee	6.00	Each	75.000	450.00
Digital Reef Hosting - Adv ECA	314.04	GB	2.000	628.08
2024 October - Production: Non-DEBTORS005				
Production	1.00	GB	250.000	250.00
Project Management	1.80	Hours	175.000	315.00

Total to Bill This Contract: US\$2,743.08

Tax Amount: US\$0.00

Total Amount Due: US\$2,743.08

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T +1 212.689.5555 F +1 212.689.1059 • E-MAIL [REDACTED]
WWW.TRANSPERFECT.COM

PAYMENT INSTRUCTIONS

Please note, TransPerfect always prefers to receive payments electronically whenever possible.

Please remit payment to:

TransPerfect Document Management, Inc.
Attn.: Accounts Receivable
1250 Broadway, 32nd Floor
New York, NY 10001
212.689.5555
[REDACTED]

Wire Transfer Details:

Flagstar Bank, N.A.
A/C #: [REDACTED] 6914
ABA Routing #: [REDACTED]
SWIFT CODE: [REDACTED]

Please reference the Contract # DM0301925 and Invoice # 268946 with your remittance.

Interest will be charged at the rate of 1.5% per month (or the maximum allowed by law)
for accounts more than 30 days past due.

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WWW.TRANSPERFECT.COM

TransPerfect - October 2024 Detailed Time Entries

Record Owner	Date	Time (Hr)	Hourly	Chronicle	Amount
Raymond Kim	10/2/2024	0.3	\$175	20241002 - correspondence with counsel, stage scan deliverable and coordinate load.	\$52.50
Sam Yu	10/2/2024	0.5	\$175	20241002 - data load 20241002_CS001\	\$87.50
Raymond Kim	10/29/2024	1.3	\$175	20241029 - various correspondence with A. Cottrell, stage data, coordinate processing and load, create saved searches, run production, encrypt and deliver.	\$227.50
Christopher Chen	10/29/2024	0.5	\$175	20241029 - Export and Finalize Production	\$87.50
		2.6			\$455.00

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Bill To:

Archdiocese Of San Francisco
Attn: Paula Carney
1 Peter Yorke Way
San Francisco, CA 94109
USA

Requested By:

Steven Gersten
Sheppard Mullin Richter & Hampton LLP
2200 Ross Ave
20th floor
Dallas, TX 75201
USA

Invoice #: 270667

Sales Contact: [REDACTED]

Invoice Date: 11/30/2024

Payment Terms: Net 30

Invoice Due: 12/30/2024

Contract #: DM0304479

Purchase Order #: RCASF Hosting November 2024

Case Name: RCASF Bankruptcy

Requested Date: 11/01/2024

Project Notes:

RCASF Hosting November 2024

Description	Quantity	Unit	Unit Cost(\$)	Extended Cost(\$)
2024 November				
Monthly Storage Fees	160.00	GB	6.000	960.00
Project Management	1.20	Hours	175.000	210.00
Monthly User Access Fee	3.00	Each	75.000	225.00
Digital Reef Hosting - Adv ECA	314.05	GB	2.000	628.10
2024 November - Production: DEBTOR020				
Production	1.00	GB	250.000	250.00
2024 November - Production: Non-DEBTORS006				
Production	2.00	GB	250.000	500.00

Total to Bill This Contract:	US\$2,773.10
Tax Amount:	US\$0.00
Total Amount Due:	US\$2,773.10

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1 of 2

PAYMENT INSTRUCTIONS

Please note, TransPerfect always prefers to receive payments electronically whenever possible.

Please remit payment to:

TransPerfect Document Management, Inc.
Attn.: Accounts Receivable
1250 Broadway, 32nd Floor
New York, NY 10001
212.689.5555
[REDACTED]

Wire Transfer Details:

Flagstar Bank, N.A.
A/C #: [REDACTED] 6914
ABA Routing #: [REDACTED]
SWIFT CODE: [REDACTED]

Please reference the Contract # DM0304479 and Invoice # 270667 with your remittance.

Interest will be charged at the rate of 1.5% per month (or the maximum allowed by law) for accounts more than a month past due.

Payment made on time

Payment Due Date	Total Due
2024-12-30	US\$2,773.10

Payment made late (interest assessed)

Late Payment Date	Total Interest Penalty Amount (1.5% per month)	Total Due
2025-01-30	US\$41.60	US\$2,814.70
2025-02-28	US\$83.19	US\$2,856.29
2025-03-28	US\$124.79	US\$2,897.89

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Record Owner	Date	Time (Hr)	Hourly	Chronicle	Amount
Raymond Kim	11/8/2024	1.0	\$175	20241108 - various correspondence with A. Cottrell, identify redacted documents, privileged documents, broken families and create (5) saved searches for review.	\$175
Emily Hong	11/12/2024	0.2	\$175	20241112 - Stage/coordinate client data process and load per request from A Cottrell	\$35
		1.2			\$210

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Bill To:

Archdiocese Of San Francisco
Attn: Paula Carney
1 Peter Yorke Way
San Francisco, CA 94109
USA

Requested By:

Steven Gersten
Sheppard Mullin Richter & Hampton LLP
2200 Ross Ave
20th floor
Dallas, TX 75201
USA

Invoice #: 272402

Sales Contact: [REDACTED]

Invoice Date: 12/31/2024

Payment Terms: Net 30

Invoice Due: 01/30/2025

Contract #: DM0306973

Purchase Order #: RCASF Hosting December 2024

Case Name: RCASF Bankruptcy

Requested Date: 12/01/2024

Project Notes:

RCASF Hosting December 2024

Description	Quantity	Unit	Unit Cost(\$)	Extended Cost(\$)
2024 December				
Monthly Storage Fees	162.00	GB	6.000	972.00
Project Management	1.60	Hours	175.000	280.00
Monthly User Access Fee	3.00	Each	75.000	225.00
Digital Reef Hosting - Adv ECA	314.05	GB	2.000	628.10
2024 December - ESI				
Technical Labor	1.00	Hour	175.000	175.00
2024 December - Production: DEBTOR021				
Production	1.00	GB	250.000	250.00
2024 December - Production: DEBTOR022				
Production	1.00	GB	250.000	250.00
Project Management	2.00	Hours	175.000	350.00

Total to Bill This Contract: US\$3,130.10

Tax Amount: US\$0.00

Total Amount Due: US\$3,130.10

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Please remit payment to:

TransPerfect Document Management, Inc.
Attn.: Accounts Receivable
1250 Broadway, 32nd Floor
New York, NY 10001
212.689.5555
[REDACTED]

Wire Transfer Details:

Flagstar Bank, N.A.
A/C #: [REDACTED] 6914
ABA Routing #: [REDACTED]
SWIFT CODE: [REDACTED]

Please reference the Contract # DM0306973 and Invoice # 272402 with your remittance.

Interest will be charged at the rate of 1.5% per month (or the maximum allowed by law) for accounts more than a month past due.

Payment made on time

Payment Due Date	Total Due
2025-01-30	US\$3,130.10

Payment made late (interest assessed)

Late Payment Date	Total Interest Penalty Amount (1.5% per month)	Total Due
2025-02-28	US\$46.95	US\$3,177.05
2025-03-28	US\$93.90	US\$3,224.00
2025-04-28	US\$140.85	US\$3,270.95

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Record Owner	Date	Time (Hr)	Hourly	Chronicle	Amount
Bhishma Desai	12/9/2024	0.8	\$175	20241209 - Production export and finalize	\$ 140
Raymond Kim	12/9/2024	1.2	\$175	20241209 - various correspondence with A. Cottrell, stage data, coordinate processing, create saved searches, create tags for branding, run production, encrypt and deliver.	\$ 210
Bhishma Desai	12/20/2024	1	\$175	20241220 - Production export and finalize	\$ 175
Emily Hong	12/26/2024	1	\$175	20241220 - Create production searches, QC fields; Run production; 20241223 - Encrypt and deliver production	\$ 175
Emily Hong	12/26/2024	0.6	\$175	20241220 - Stage/coordinate client data process and load per request from J Herschap; Coordinate imaging of documents; Correspondence w/ J Herschap re: custodian, production volume, bates number, confidentiality branding	\$ 105
		4.6			\$ 805

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Bill To:

Archdiocese Of San Francisco
Attn: Paula Carney
1 Peter Yorke Way
San Francisco, CA 94109
USA

Requested By:

Amanda Cottrell
Sheppard Mullin Richter & Hampton LLP
2200 Ross Avenue
Floor 20
Dallas, TX 75201
USA

Invoice #: 274593

Sales Contact: [REDACTED]

Invoice Date: 01/31/2025

Payment Terms: Net 30

Invoice Due: 03/02/2025

Contract #: DM0309397

Purchase Order #: RCASF Hosting January 2025

Case Name: RCASF Bankruptcy

Requested Date: 01/01/2025

Project Notes:

RCASF Hosting January 2025

Description	Quantity	Unit	Unit Cost(\$)	Extended Cost(\$)
2025 January				
Monthly Storage Fees	162.00	GB	6.000	972.00
Project Management	1.50	Hours	175.000	262.50
Monthly User Access Fee	3.00	Each	75.000	225.00
Digital Reef Hosting - Adv ECA	314.05	GB	2.000	628.10
2025 January - Production: DEBTOR023				
Production	1.00	GB	250.000	250.00
Project Management	1.90	Hours	175.000	332.50

Total to Bill This Contract: US\$2,670.10

Tax Amount: US\$0.00

Total Amount Due: US\$2,670.10

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PAYMENT INSTRUCTIONS

Please note, TransPerfect always prefers to receive payments electronically whenever possible.

Please remit payment to:

TransPerfect Document Management, Inc.
Attn.: Accounts Receivable
1250 Broadway, 32nd Floor
New York, NY 10001
212.689.5555
[REDACTED]

Wire Transfer Details:

Flagstar Bank, N.A.
A/C #: [REDACTED] 6914
ABA Routing #: [REDACTED]
SWIFT CODE: [REDACTED]

Please reference the Contract # DM0309397 and Invoice # 274593 with your remittance.

Interest will be charged at the rate of 1.5% per month (or the maximum allowed by law) for accounts more than a month past due.

Payment made on time

Payment Due Date	Total Due
2025-03-02	US\$2,670.10

Payment made late (interest assessed)

Late Payment Date	Total Interest Penalty Amount (1.5% per month)	Total Due
2025-04-03	US\$40.05	US\$2,710.15
2025-05-05	US\$80.10	US\$2,750.20
2025-06-05	US\$120.15	US\$2,790.25

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Payment remittance only: [REDACTED] • Enquiries: GlobalCollections@transperfect.com or your Sales Contact
WWW.TRANSPERFECT.COM

Record Owner	Date	Time (Hr)	Hourly	Chronicle	Amount
Raymond Kim	1/14/2025	1.3	\$175	20250114 - review multiple PDFs, verify document breaks, various correspondence with A. Cottrell, break up PDFs and create single page PDFs for review and coordinate processing.	\$ 227.50
Emily Hong	1/21/2025	0.2	\$175	20250103 - Re-upload production onto the sFTP per request from A Cottrell; Correspondence re:same	\$ 35.00
Raymond Kim	1/23/2025	1.4	\$175	20250123 - various correspondence with A. Cottrell, create saved searches, check tagging, branding, run production, encrypt and deliver.	\$ 245.00
Bhishma Desai	1/23/2025	0.5	\$175	20250123 - Production export and finalize	\$ 87.50
		3.4			\$ 595.00